

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF HAWAII

| | | |
|----------------------------|---|-------------------------------|
| BERT MEYER, |) | Civil No.: CV04 00049 JMS-BMK |
| |) | (In Admiralty) |
| Plaintiff, |) | |
| |) | DECLARATION OF THOMAS E. |
| vs. |) | IRONS; EXHIBIT "I" |
| |) | |
| MATSON NAVIGATION |) | |
| COMPANY, INC.; and PACIFIC |) | |
| LIVESTOCK, INC., |) | |
| |) | |
| Defendants. |) | |
| _____ |) | |

DECLARATION OF THOMAS E. IRONS

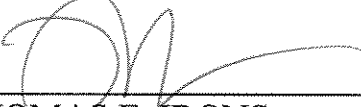
I, THOMAS E. IRONS, hereby declare:

1. I am an attorney with Hughes & Taosaka and I am one of the attorneys representing Pacific Livestock, Inc. ("PLI") in this matter.
2. Attached as Exhibit "I" are true and correct copies of excerpts of the Pacific Coast Marine Safety Code 2002 Edition I obtained from Matson Navigation Company, Inc. ("Navigation").
3. On October 6, 2005, Navigation provided me with two banker's boxes of discovery. On October 7, 2005 Plaintiff provided a trial exhibit binder. I worked diligently to "get up to speed" while simultaneously dealing with impending mediation and trial dates.

4. A mediation which included Terminals was held on January 11, 2006. At the mediation, I indicated PLI was considering a claim against Terminals.

5. Between October 18, 2005 and January 11, 2006 I diligently reviewed the voluminous documents provided by Navigation in preparation for the mediation.

DATED: Honolulu, Hawaii, FEB 27 2006.



THOMAS E. IRONS